

# **Exhibit A**

PAUL RACHMUTH, LAW OFFICE  
265 SUNRISE HIGHWAY, STE. 1515  
ROCKVILLE CENTRE, NEW YORK 11570  
TELEPHONE: (516) 330-0170 FACSIMILE: (516) 543-0516 PAUL@PARESQ.COM

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October 9, 2024

Via Email: dan@vedralaw.com

Daniel Vedra, Esq.  
Vedra Law LLC  
1444 Blake Street  
Denver, CO 80202

Re: Floyd's of Leadville, Inc. n/k/a Valued, Inc. v Alexander Capital L.P. - 22CV03318

Dear Daniel:

I am attaching an August 13, 2024 police report and Complaint Information Form and Certification in Support of Probable Cause by Frank Squilla ("Complaint"). According to the Complaint, Vice President of Sales & Operations for Plaintiff Floyd's of Leadville, Inc. n/k/a Valued, Inc. ("Plaintiff"), Bob Bell, intimidated and threatened bodily harm to a potential witness by telephone. Equally concerning, I understand that Mr. Bell also communicated threats intended to be communicated to my client, Mark Leonard.

Frank Squilla, at times a business associate of Mr. Leonard, was listed on Mr. Leonard's initial disclosures as a potential witness as well as a potential witness on Plaintiff's initial disclosures. Mr. Squilla certified that Mr. Bell screamed that he was "coming for" Mr. Squilla, would beat Mr. Squilla to a pulp and kill him. I have been informed that Mr. Bell said that he was going to do the "same thing to Mark Leonard."

I am obviously concerned about an agent of Plaintiff threatening a potential witness and my client, Mark Leonard. Of added concern is the apparent time of the call. The police report indicates that Mr. Bell made these threats at 1:00 PM Eastern time on August 13. On August 13, from 9:06 AM until 7:12 PM Eastern, you conducted the remote deposition of Jonathan Gazdak. I believe Mr. Bell attended that deposition with you in your office.

Please respond expeditiously with any relevant facts and any steps you are taking to ensure that the actions threatened in the Complaint do not occur, the harassment comes to an end and no further threats, such as those described in the Complaint, are made in the future.

Sincerely,

  
Paul A. Rachmuth

Encl.

667-2024  
8/15

Christine Ciallrella, RMC  
Township Clerk  
cciallrella@twp.washington.nj.us  
856-589-0520 ext. 214

**OPEN PUBLIC RECORDS ACT REQUEST FORM**  
**TOWNSHIP OF WASHINGTON**  
**523 EGG HARBOR ROAD**  
**SEWELL, NJ 08080**

Barbara Moore  
Deputy Clerk  
bmoore@twp.washington.nj.us  
856-589-0520 ext. 213

**WE DO NOT ACCEPT FAXES.**  
**PLEASE EMAIL, MAIL OR DELIVER IN PERSON ONLY!**

**Important Notice**

The last page of this form contains important information related to your rights concerning government records. Please read it carefully.

**Requestor Information – Please Print**

First Name Francis MI A Last Name Squilla  
E-mail Address FRANKSQUILLA@COMCAST.NET  
Mailing Address 4 CAVESSON TRAIL  
City Sewell State NJ Zip 08080  
Telephone 609 220 9979 FAX N/A  
Preferred Delivery: Pick Up ☒ US Mail ☐ On-Site Inspect ☐ Fax ☐ E-mail ☒  
If you are requesting records containing personal information, please circle one: Under penalty of N.J.S.A. 2C:28-3, I certify that I HAVE / (HAVE NOT) been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.  
Signature [Signature] Date 8/15/24

**Payment Information**

Maximum Authorization Cost \$  
Select Payment Method  
Cash ☐ Check ☐ Money Order ☐  
Fees: Letter size pages - \$0.05 per page  
Legal size pages - \$0.07 per page  
Other materials (CD, DVD, etc) – actual cost of material  
Delivery: Delivery / postage fees additional depending upon delivery type.  
Extras: Special service charge dependent upon request.

**Record Request Information:** Please be as specific as possible in describing the records being requested. Also, please note that your preferred method of delivery will only be accommodated if the custodian has the technological means and the integrity of the records will not be jeopardized by such method of delivery.

Property Address \_\_\_\_\_  
Records Requested CASE # 24-38212  
IT is the Report I filed w/ Officer DiStefano

**AGENCY USE ONLY**

Est. Document Cost \_\_\_\_\_  
Est. Delivery Cost \_\_\_\_\_  
Est. Extras Cost \_\_\_\_\_  
Total Est. Cost \_\_\_\_\_  
Deposit Amount \_\_\_\_\_  
Estimated Balance \_\_\_\_\_  
Deposit Date \_\_\_\_\_

**AGENCY USE ONLY**

**Disposition Notes**  
Custodian: If any part of request cannot be delivered in seven business days, detail reasons here.

In Progress ☐ Open \_\_\_\_\_  
Denied ☐ Closed \_\_\_\_\_  
Filled ☐ Closed \_\_\_\_\_  
Partial ☐ Closed \_\_\_\_\_

**AGENCY USE ONLY**

**Tracking Information**

Tracking # \_\_\_\_\_  
Rec'd Date \_\_\_\_\_  
Ready Date \_\_\_\_\_  
Total Pages \_\_\_\_\_


**Final Cost**

Total \_\_\_\_\_  
Deposit \_\_\_\_\_  
Balance Due \_\_\_\_\_  
Balance Paid \_\_\_\_\_

**Records Provided**

Custodian Signature \_\_\_\_\_

Date \_\_\_\_\_

		<b>Washington Police Department</b>		<b>Incident Report</b>			
		Incident: <b>4-HARASSMENT</b>					
		Incident Report Number: <b>24-038212</b>		Between: Date - Time		And/At: Date-Time	
						<b>8/13/24 16:20</b>	
		Incident Location: <b>1 McClure DR, Sewell Washington, NJ, 08080</b>					
Offense - 1: <b>2C:33-4</b>		Offense - 2:		Offense - 3:		Offense - 4:	
Offense - 5:		Offense - 6:		Offense - 7:		Offense - 8:	
<b>V</b>	Name (Last, First, Middle) <b>Squilla, Frank</b>			DOB: [REDACTED]		Race/Sex <b>W/</b>	
Address: (Address, City, State, Zip) [REDACTED]						Phone 1 [REDACTED]	
Employer						Phone 2	
Employer Address						Work Phone #	
	Name (Last, First, Middle)			DOB:		Race/Sex	
Address: (Address, City, State, Zip)						Phone 1	
Employer						Phone 2	
Employer Address						Work Phone #	
<b>NARRATIVE</b>							
<p><b>Origin:</b> On 08/13/2024 at approximately 1620 hours I, (Ofc. DeStefano #10-214), was dispatched to a non-emergency call for service at 1 McClure Drive for a reported Harassment.</p> <p><b>Arrival:</b> Upon my arrival I met with the victim, Frank A. Squilla</p> <p><b>Interview of Victim:</b> The victim, Frank Squilla, explained that on 08/13/2024 he received a call from Robert Bell. Squilla further explained that Bell and his business partner Floyd Landis are involved in litigation with business associates of his. Bell contacted Squilla due to him being in possession of over 200 emails with his name on it. Bell stated that Squilla is "a piece of shit" and subsequently advised that "when he sees him, he will give him the biggest beating of his life." Bell also explained that he would find Squilla and kill him. Out of fear, Squilla mentioned to Bell that the phone call is being recorded. Bell responded by explaining that he was not advised of this nor given permission for</p>							
Vehicle Information: (Year, Make, Model, Style, Color)							
License Number:	State:	Expiration Year:	Vin:	Insurance Company:			
Other Vehicle Information:						NCIC#	
Reporting Officer(s): <b>DeStefano, Louis A.</b>				Payroll Number: <b>LD10214</b>		Report Date: <b>08/17/2024</b>	
Time Received: <b>16:20:54</b>	Time Cleared: <b>16:49:34</b>	Unit(s) Assigned: <b>P10214</b>		Pages:			
Reviewed by: <b>Conti, Michael P.</b>		Payroll Number: <b>MCR103</b>		Copy To			

Date:

08/17/2024

Offense - 1:

2C:33-4

Incident Report Number:

24-038212

Washington Police Department		Continuation
Incident Report Number 24-038212	Incident Location: 1 McClure DR, Sewell Washington, NJ, 08080	Incident Date: 08/13/2024
<p>the call to be recorded.</p> <p><b><u>Interview of Witness:</u></b> N/A</p> <p><b><u>Interview Accused:</u></b> N/A</p> <p><b><u>Investigation:</u></b> I took a report to document the incident. Squilla received a phone call from Bell in regard to being in possession of Squilla's emails. In regard to the emails, Bell had begun threatening him over the phone and stated he would find Squilla and kill him. Squilla advised Bell he was being recorded, in which Bell further advised that he did not have Squilla's permission. I advised Squilla of the process to endorse criminal complaints at the Washington Township Court Office. Squilla completed a written statement (see attached). No further investigation from this officer.</p>		
Reporting Officer(s): DeStefano, Louis A.	Payroll Number: LD10214	Pages: 2 of 3

**Washington Police Department****Continuation**

Incident Report Number

24-038212

Incident Location:

1 McClure DR, Sewell Washington, NJ, 08080

Incident Date:

08/13/2024

**NAMES****Suspect**

Bell, Robert W/ of [REDACTED]

Phone 1: [REDACTED]

Reporting Officer(s):

DeStefano, Louis A.

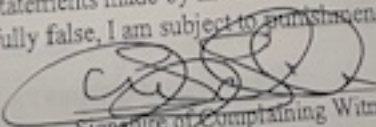
Payroll Number:



LD10214

Pages:

3 of 3



New Jersey Judiciary Municipal Court of New Jersey			
Certification in Support of Probable Cause			
State of New Jersey	Municipal Court Name <u>WASH TWP</u>	County of <u>Gloucester</u>	
Court Address <u>3 McCune</u>	City <u>SEWELL</u>	Zip <u>08080</u>	
Date of Incident <u>8/13/24</u>	Location of Incident <u>WAWA 5PM VIA PHONE</u>	Municipality <u>WASH TWP</u>	
I offer the following facts and information to establish probable cause in this complaint against (Defendant's name) <u>ROBERT "BOB" BELL</u> , whom I would like to charge with (list Statutes or Ordinances): <del>2C 28-5A</del> <u>2C 28-5A WITNESS TAMERING</u>			
How do you know the identity of the person you are charging? <u>Business Associates</u>			
Describe the incident in detail: <u>8/13/24 1PM I RECEIVED A PHONE CALL WHILE AT 5PM</u> <u>WAWA IN RESPONSE TO ONGOING LITIGATION OF WHICH I</u> <u>AM A WITNESS. TODAY THERE WERE DEPOSITIONS IN NYC, WHICH</u> <u>I DID NOT PARTICIPATE. THE CALL I RECEIVED WAS FROM</u> <u>ROBERT "BOB" BELL, WHERE HE WENT ON A PROFANITY LADEN</u> <u>TIRADE SCREAMING AT THE TOP OF HIS LUNGS THAT HE WAS</u> <u>COMING FOR ME, WOULD BEAT ME TO A PULP + KILL ME. HE WAS</u> <u>UNHINGED. I AM AN INVESTOR IN HIS COMPANY &amp; HE TOLD ME</u> <u>AS WELL THAT THE \$125K INVESTMENT IS INTEREST. I ALSO</u> <u>HAVE THAT IN WRITING THIS IS THE END OF ALL CALLS. I DO</u> <u>NOT WANT THIS MAN OR ANY OF</u>			
Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.			
<u>8/15/24</u> Date		 Signature of Complaining Witness Print Name	

New Jersey Judiciary Municipal Court of New Jersey Complaint Information Form			
 			
Instructions: Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.			
Your Name (you are the complainant)			
FRANCIS A Sguilla		State	Zip
4 CAVESSON TRAIL		City	NJ 08080
Telephone Number		Email Address	
609 220 9929		FRANK.Sguilla@COMCAST.NET	
Defendant's Name			
ROBERT "BOB" BELL		State	Zip
1800 FAIRFAX ST		City	CO 80220
Telephone Number (if known)		Date of Birth (if known)	Driver's License (if known)
201 248 7517		?	?
Is the person you are charging an elected public official or a candidate for elected public office? If yes, provide any information regarding what elected office the person is a candidate for or currently holds			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If this is a motor vehicle complaint list			
Licensed Plate # of Other Vehicle	State	Description of vehicle (if known)	
Names and addresses of witnesses (use additional paper if necessary)			
Name		Address	
<b>For Court Use Only</b>			
Court Administrator/Deputy Initials		Date:	
Corresponding Complaint Numbers			
(Every request requires the filing of a complaint.)			



New Jersey Judiciary Municipal Court of New Jersey		Confidential Domestic Violence Complaint Information Form (Not to be Disclosed)	
<p>Instructions: Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.</p>			
Your Name (you are the complainant)			
FRANCIS A Squilla			
Street Address		City	State Zip
4 CAVESSON TRAIL		SEWELL	NJ 08080
Telephone Number		Email Address	
609 220 9979		franksquilla@comcast.net	
Defendant's Name			
ROBERT BOB BELL			
Street Address		City	State Zip
180 FAIRFAX ST.		DENVER	CO 80220
Telephone Number (if known)		Date of Birth (if known)	What is your relationship to the defendant?
301 248 7517			BUSINESS ASSOCIATE
<p>Is the person you are charging an elected public official or a candidate for elected public office? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, provide any information regarding what elected office the person is a candidate for or currently holds</p>			
When did the offense occur?		Where did the offense occur?	
8/13/24		ON A PIER CALL WHILE AT WAWA SAK.	
<p>Is there a domestic violence restraining order in effect? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>			
In which county was the restraining order obtained?		What is the effective date of the restraining order?	
Names and addresses of witnesses (use additional paper if necessary)			
Name		Address	
<p align="center"><b>For Court Use Only</b></p>			
Court Administrator/Deputy Initials: _____		Date: _____	
Corresponding Complaint Numbers: _____			
(Every request requires the filing of a complaint.)			

New Jersey Judiciary  
Municipal Court of New Jersey

Certification in Support of Probable Cause

State of New Jersey      Municipal Court Name: Washington Twp      County of: Glorioso

Court Address: 3 MCCURE DR      City: Seewell      Zip: 08080

Date of Incident: 8/13/24      Location of Incident: WASH TWP

I offer the following facts and information to establish probable cause in this complaint against  
(Defendant's name) ROBERT "BOB" BEUL whom I would like to charge with (Set Statutes  
or Ordinances) Threats, Harassment, Business Associates in Litigation Case with him  
Threats, Harassment, Business Associates      AND KILL ME. I AM A WITNESS



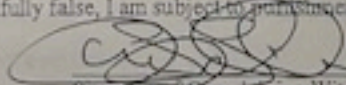
How do you know the identity of the person you are charging?  
Business Associates

Describe the incident in detail:  
8/13/24 1PM BOB BEUL CALLED ME WHILE I WAS AT WAWA. CALLED ME A PIECE OF SHIT & THAT HE WAS COMING FOR ME & WANTS TO BEAT ME & KILL ME. THIS IS IN RESPONSE TO A FAKE BUSINESS RELATIONSHIP I AM NOT INVOLVED IN THE LITIGATION, BUT CITED AS A WITNESS FOR THE OTHER SIDE. I ALSO INVESTED INTO FLOYD LAND'S CBA COMPANY, WHOM BOB IS THE COO. DURING THIS CASE AS WELL AS IN EMAIL HE STATED THE SHARES WE PURCHASED WERE OFFICIALLY BEEN FORFEITED. I GUESS NOW THAT IS ALSO TRUTH 9/12/25K AND OTHERS. HE WAS UNHINGED & SCARY.

Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 9/15/24      Signature of Complaining Witness: [Signature]  
Print Name: \_\_\_\_\_

Revised 04/2017. CN 11822

 New Jersey Judiciary Municipal Court of New Jersey 		
Certification in Support of Probable Cause		
State of New Jersey	Municipal Court Name <u>WASH TWP</u>	County of <u>Clowester</u>
Court Address <u>3 McClellan</u>	City <u>SEWELL</u>	Zip <u>08080</u>
Date of Incident <u>8/13/24</u>	Location of Incident <u>Wawa 58th via Pitone</u>	Municipality <u>WASH TWP</u>
I offer the following facts and information to establish probable cause in this complaint against (Defendant's name) <u>ROBERT "BOB" Bell</u> , whom I would like to charge with (list Statutes or Ordinances): <u>2C 33-4. A Harassment</u>		
How do you know the identity of the person you are charging? <u>Business Associates</u>		
Describe the incident in detail: <u>8/13/24 1PM I Received A Phone CALL while AT 58th Wawa In Response to ongoing Litigation of which I Am A witness. Today There were Depositions in NYC, which I did not Participate. The CALL I Received was from ROBERT "BOB" Bell, where He went on A Profanity Laced Tirade Screaming AT The DP of His Lungs That He was coming for me, would Beat me to A pulp + Kill me. He was untinges. I Am An Invest in His company &amp; He told me As well That The 125K investment is forfeited. I Also Have That in writing This is The end of A few CALLS. I do NOT WANT This Man OR ANY OF</u>		
Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.		
<u>8/15/24</u> Date	 Signature of Complaining Witness Print Name	



New Jersey Judiciary Municipal Court of New Jersey		County of <u>Bergen</u>	
State of New Jersey		Municipal Court Name <u>WASH TWP</u>	
Court Address <u>3 McCue</u>		City <u>SEWELL</u>	Zip <u>08080</u>
Date of Incident <u>8/13/24</u>	Location of Incident <u>WASH TWP</u>		
I offer the following facts and information to establish probable cause in this complaint against (Defendant's name) <u>ROBERT "BOB" BELL</u> , whom I would like to charge with (list Statutes or Ordinances): <u>2C 28-5 WITNESS TAMPERING</u>			
How do you know the identity of the person you are charging? <u>BUSINESS ASSOCIATES</u>			
Describe the incident in detail: <u>8/13/24 1PM I RECEIVED A PHONE CALL WHILE AT 5A3 WAWA IN RESPONSE TO ONGOING LITIGATION OF WHICH I AM A WITNESS. TODAY THERE WERE DEPOSITIONS IN NYC, WHICH I DID NOT PARTICIPATE. THE CALL I RECEIVED WAS FROM ROBERT "BOB" BELL, WHERE HE WENT ON A RANT SAYING HE WAS TIRED SCREAMING AT THE DP OF HIS WIFE THAT HE WAS COMING FOR ME, WOULD BEAT ME TO A PULP &amp; KILL ME. HE WAS UNHINGED. I AM AN INVESTOR IN HIS COMPANY &amp; HE TOLD ME AS WELL THAT THE \$125K INVESTMENT IS INTEREST. I ALSO HAVE THAT IN WRITING THIS IS THE END OF ALL CALLS. I DO NOT WANT THIS MEMO OR ANY OF</u>			
Certification: I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. <u>8/15/24</u> Date			
<u>[Signature]</u> Signature of Complaining Witness Print Name			

New Jersey Courts Municipal Court of New Jersey		New Jersey Judiciary Municipal Court of New Jersey		Confidential Domestic Violence Complaint Information Form (Not to be Disclosed)	
Instructions: Please complete the following information to the best of your ability. This information will help in the preparation of the complaint.					
Your Name (you are the complainant) <b>Francis A Squilla</b>					
Street Address <b>4 CAVESSON TRAIL</b>		City <b>SEWELL</b>	State <b>NJ</b>	Zip <b>08580</b>	
Telephone Number <b>609 220 9979</b>		Email Address <b>franksquilla@comcast.net</b>			
Defendant's Name <b>ROBERT "BOB" BELL</b>					
Street Address <b>1800 FAIRFAX ST.</b>		City <b>DENVER</b>	State <b>CO</b>	Zip <b>80220</b>	
Telephone Number (if known) <b>201 248 7517</b>		Date of Birth (if known)	What is your relationship to the defendant? <b>BUSINESS ASSOCIATE</b>		
Is the person you are charging an elected public official or a candidate for elected public office? If yes, provide any information regarding what elected office the person is a candidate for or currently holds <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
When did the offense occur? <b>8/13/24</b>		Where did the offense occur? <b>ON A Phone CALL while AT WAWA</b> <sup>SAT.</sup>			
Is there a domestic violence restraining order in effect? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
In which county was the restraining order obtained?			What is the effective date of the restraining order?		
Names and addresses of witnesses (use additional paper if necessary)					
Name		Address			
<b>For Court Use Only</b>					
Court Administrator/Deputy Initials: _____					Date: _____
Corresponding Complaint Numbers: _____					
(Every request requires the filing of a complaint.)					